

FILED

SEP 13 2006

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA**

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
WESTERN DIVISION

| | |
|----------------------------|-----------------------|
| ROSLYN COOK-DEYAMPERT, and |) |
| GENEVA BROWN |) |
| |) |
| Plaintiff, |) |
| |) |
| v. |) CIVIL ACTION NUMBER |
| |) 03-C-3132-W |
| ALABAMA DEPARTMENT OF |) |
| TRANSPORTATION, et al. |) |
| |) |
| Defendants. |) |

PLAINTIFF'S REQUESTED VOIR DIRE QUESTIONS

Plaintiff requests the Court to ask the following questions during its voir dire examination of the jury panel:

1. Do any of you know the plaintiffs in this case: Roslyn Cook-Deyampert or Geneva Brown.
2. Do any of you know any of the following people who may be witnesses in this case: (read from witness lists of parties)
3. Have any of you ever been an employee of the Alabama Department of Transportation any other department of the State of Alabama?
4. Have any of your family (husband, wife, brother, or sister, children, mother or father) ever worked for ADOT or any other department of the State of Alabama?

5. Have any of you ever worked for a personnel department of any company?
6. Have any of you ever had a position with a company which gave you the authority to hire, fire, lay-off, promote, or make other personnel decisions?
7. Have any of you ever owned your own business?
8. Have any of you ever run a business for someone else?
9. Have any of you ever been terminated from a job?
10. Have any of you ever held a position in management for any company?
11. Have any of you ever been members of a union?
12. Do any of you feel that a public employee does not have the right to speak out on matters involving the public interest and not be retaliated for it?
13. Is there anyone here who feels that the ADOT has the right to terminate any of its employees just because he does not like the fact that they have spoken out against him in public?
14. Is there anyone here who believes that a state employee does not have the right to engage in litigation against their employer for civil rights violations such as race discrimination or retaliation without being retaliated against?
15. Is there anyone here who believes that a state employee does not have the right to talk to legal counsel about discrimination in their workplace without reprisal by their employer?
16. Is there anyone here who believes that employee losses that right to talk with their lawyer about discrimination in the work place when they are promoted into a management position with that employer?

17. Is there anyone here who believes that a manager does not have the right to testify truthfully about race discrimination, even if detrimental to the employer without being terminated for that testimony?
18. Does anyone believe that if a manager testifies truthfully about a matter that is adverse to the interest of the employer, that is betraying the trust of the employer?
19. Do any of you believe that a management employee should be terminated from her job when told by her attorney to testify truthfully about a matter that is detrimental to the interest of the manager's employer?
20. Have you or any member of your family, ever been a plaintiff in a lawsuit? If so, what was the outcome of the case?
21. Have you, or any member of your family, ever been a defendant in a lawsuit? If so, what was the outcome of the case?
22. Have you ever served on a jury in a case? If so, was it a criminal or civil case and what was the outcome? Did you serve as foreperson for that jury?
23. Do any of you have any bumper stickers on your automobiles? What do they say?
24. Is there anyone here who for any reason does not feel that he or she can sit and decide this case without prejudice to one side or the other?
25. Is there anyone here who, if the evidence so warrants, will have difficulty awarding back-pay or other monetary relief against the state of Alabama in this action?
26. Do any of you know any of the lawyers in this case? (Read letterhead)

Respectfully submitted,

s/C. Michael Quinn

C. Michael Quinn

Alabama State Bar Number: 2365-642c

Attorney for Plaintiffs

OF COUNSEL:

WIGGINS, CHILDS, QUINN & PANTAZIS

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CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of September 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following (or by U.S. Mail to the non-CM-ECF participants):

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s/C. Michael Quinn